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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

DANIEL D'AMBLY,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a @ANTIFASH  
GORDON; ST. LAWRENCE UNIVERSITY;  
TRIBUNE PUBLISHING COMPANY, LLC;  
NEW YORK DAILY NEWS; VIJAYA  
GADDE; TWITTER, INC; COHEN, WEISS  
AND SIMON, LLP; UNNAMED  
ASSOCIATES 1 – 100,

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880-JMV-JAD

**CERTIFICATION OF PATRICK  
TRAINOR, ESQ., IN SUPPORT OF  
PLAINTIFF'S MOTION FOR LEAVE TO  
FILE A FIRST AMENDED COMPLAINT**

PATRICK TRAINOR, ESQ., by way of certification in lieu of affidavit, hereby states as follows:

1. I am an attorney-at-law of the State of New Jersey and associated with the Law Office of Patrick Trainor, attorney for the Plaintiff Daniel D'Ambly ("D'Ambly"). I make this Affidavit in support of Plaintiff's motion for an Order amending the Complaint.

2. D'Ambly makes this Motion for Leave to file a First Amended Complaint to add new plaintiffs against defendants Christian Exoo a/k/a @AntiFashGordon, St. Lawrence University, Vijaya Gadde, and Twitter, Inc.

3. The proposed new plaintiffs do not bring any claims against defendants Tribune Publishing Company, LLC, New York Daily News, or Cohen, Weiss, and Simon, LLP.

4. On or about OCTOBER 30, 2020, counsel for defendant ST. LAWRENCE UNIVERSITY (“STL”), filed a Motion to Dismiss pursuant to Rule 12(b)(6). D’Ambly filed his opposition to this motion on NOVEMBER 23, 2020.

5. On NOVEMBER 20, 2020, counsel for defendants VIJAYA GADDE and TWITTER, INC. (collectively “TWITTER”), filed a Motion to Dismiss. On December 29, 2020, the due date for Plaintiff’s opposition was extended to JANUARY 16, 2021.

6. On DECEMBER 6, 2020, counsel for defendant CHRISTIAN EXOO A/K/A @ANTIFASHGORDON (“EXOO”), filed a Motion to Dismiss. D’Ambly’s opposition is due on JANUARY 16, 2021.

7. Defendants EXOO, STL, and TWITTER have not filed responsive pleadings.

8. On or about JANURAY 7, 2021, this firm on behalf of D’Ambly contacted counsel for all defendants by email to request permission to file the First Amended Complaint. The request for permission sent to counsel for all defendants included a copy of the First Amended Complaint and a copy of the First Amended Complaint that indicated in what respect it differed from the original Complaint. A copy of the proposed First Amended Complaint is annexed hereto as **Exhibit A**.

9. On JANUARY 8, 2021, counsel for defendant Cohen, Weiss, and Simon, objected to consent. None of the other defendants replied to D’Ambly’s request for permission to file the First Amended Complaint.

10. Accordingly, Plaintiff respectfully requests that this Court grant it leave to amend the Complaint in this matter.

Dated: January 10, 2021

  
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PATRICK TRAINOR